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**From:** Armando Jimenez [AJimenez@mbard.org]  
**Sent:** 12/14/2017 6:58:02 PM  
**To:** TSAI, YA-TING [Tsai.Ya-Ting@epa.gov]  
**CC:** Mary Giraudo [MGiraudo@mbard.org]  
**Subject:** NSPS OOOOa - Fugitive Emissions Requirements  
**Attachments:** Updates from US EP Region 9 - rios.pdf

Hi Sheila,

The District is working on the Title V renewal for two oil and gas production facilities and we have a question regarding NSPS OOOOa's fugitive emission requirements.

The November CAPCOA presentation that Gerardo gave to the Districts pointed out that all aspects of the 2016 rule revisions to Subparts OOOO and OOOOa are currently in effect and that a further 2-year stay of these requirements is being reconsidered (see page 5 of the attached presentation). The District has drafted permit conditions that address the fugitive emission requirements of Section §60.5397a. Should the District include the new permit conditions now, while the 2-year is being reconsidered?

Thanks,

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